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9 *Investors, LLC*

10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 VANESSA NELSON

13 Plaintiff,

14 vs.

15 WOOD RESIDENTIAL, LLC; WOOD
16 PARTNERS, LLC; WOOD REAL ESTATE
17 INVESTORS, LLC; and DOES 1-50,
inclusive,

18 Defendants.

Case No. 2:24-cv-00419-ART-BNW

**STIPULATION TO EXTEND THE
DEADLINE FOR DEFENDANTS TO
RESPOND TO PLAINTIFF'S
AMENDED COMPLAINT**

(First Request)

19 IT IS HEREBY STIPULATED by and between the parties, through their respective counsel,
20 to extend the current deadline, October 23, 2024, four weeks to November 20, 2024, for Defendants
21 to file answers to Plaintiff's Amended Complaint.

22 1. On October 9, 2024, the Court held a hearing on Defendants' respective Motions to
23 Dismiss. ECF No. 28 and 29. The Court ruled from the bench and denied Defendants' motions on
24 October 9, 2024. A Minute Order followed on October 22, 2024. ECF No. 45.

25 2. Defendants are required to file answers within fourteen (14) days after denial of a
26 motion to dismiss pursuant to Fed. R. Civ. Proc. 12(a)(4)(A). Thus, the deadline for Defendants to
27 file answers to the Amended Complaint is October 23, 2024.

28 3. The Amended Complaint includes twelve (12) claims and asserts collective claims

1 under the Fair Labor Standards Act and class action wage related claims under Nevada Revised
 2 Statutes Chapter 608, spanning twenty-four (24) pages and 158 discrete paragraphs, plus
 3 subparagraphs as to the class/collective claims, requiring substantive responses in answers coupled
 4 with affirmative defenses.

5 4. Undersigned Defense Counsel, as the Office Managing Principal for Las Vegas, has
 6 been covering multiple cases, hearings, depositions, and mediations over the past several weeks
 7 (including travel to Reno, Nevada for depositions), as counsel has recently lost three attorneys in
 8 her office and is responsible for covering their workloads.

9 5. Given Defense Counsels' recent additional workload and the scope and breadth of
 10 the Amended Complaint, Defendants need additional time to complete their answers.

11 6. Thus, the parties hereby stipulate to extend the deadline to November 20, 2024, for
 12 Defendants to file answers to the Amended Complaint.

13 7. This request is made in good faith and not for the purpose of delay.

14 Dated this 23rd day of October, 2024.

15 RAFII & ASSOCIATES, P.C.

JACKSON LEWIS P.C.

16 /s/ Jason Kuller

16 /s/ Deverie J. Christensen

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20 **ORDER**

21 IT IS HEREBY ORDERED that the deadline for Defendants to file answers to Plaintiff's
 22 Amended Complaint is continued to November 20, 2024.

23 Dated this 24 day of October, 2024.

24
 25 
 26 United States District Court/Magistrate Judge
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